

Appl. No. 10/657,231
Amendment dated: July 20, 2004
Reply to OA of: April 21, 2004

REMARKS

Applicant thanks the Examiner for the thorough consideration given the present application. Claims 1-30 are currently being prosecuted. The Examiner is respectfully requested to reconsider his rejections in view of the amendments and remarks as set forth below.

Claim Rejections - 35 U.S.C. § 102

Claims 1-7, 11, 12, 14, 23 and 24 stand rejected under U.S.C. 102(b) as being anticipated by Fig. 1, Applicant's admitted prior art. The rejections are respectfully traversed.

Applicants wish to direct the Examiner's attention to MPEP § 2131 which states that to anticipate a claim, the reference must teach every element of the claim.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

The Examiner states that Fig. 1 still meets the limitations as set forth in the claimed invention, where as a bond wire 164 can be considered as a first conductive body which is disposed continuously on the first active surface 122 and the second active surface 142, and electrically connecting the first chip 12 and the second chip 14. Concerning claims 2-7, 11, 12, 14, 23 and 24, please see Fig. 1 and see pages 1-3 in the Spec. However, the bond wire 164 should not be read in the scope of the claimed

invention, as the first conductive body is disposed "continuously on the first active surface and the second active surface".

More particularly, the first conductive body is disposed "continuously on the first active surface and the second active surface", so that it is extended directly from the first active surface to the second active surface. In other words, the first conductive body is laid on and directly contacts to a continuously surface. This continuously surface is constructed of the first bonding pad 228 of the first chip 22 and the second bonding pad 248 of the second chip 24 (see Fig. 2 and Fig. 9 of the application).

The continuously surface is also constructed of the first bonding pad 226 of the first chip 22, part of the first active surface 222 of the first chip 22, the upper surface 292 of the filler 29, part of the second active surface 242 of the second chip 24, and the second bonding pad 246 of the second chip 24 (see Figs. 3-6 of the application). This feature is different from the bond wire 164 in Fig. 1.

In addition, since the bond wire 164 for electrically connecting the first chip 12 and the second chip 14 is disclosed in the "RELATED ART" of the application, the first conductive body of the claimed invention obviously does not include the conventional bond wire. Moreover, the manufacturing method of the conductive body is distinct from that of the conventional bond wire, the wire-bonding method. Please see paragraph [0029] and Figs. 7-9.

The mask layer 254 is formed on the first active surface 222 of the first chip 22, the second active surface 242 of the second chip 24, and the upper surface 202 of the carrier 20. After a exposure process, the openings 256 can be formed to expose the first bonding pad 226, the second bonding pad 246 and the contact 208 of the carrier 20. Next, a solder material 258 is filled into the opening 256 defined by the mask layer 254 as shown in FIG. 8. Therein, the solder material comprises flux and metal powder, wherein the metal powder is mixed up with metal powder equally. Then a reflow process is performed so as to make the metal powder melted and solidified. Thus a conductive body 259 is formed on the first bonding pad 226, the second bonding pad 246 and the carrier contact 208 as shown in FIG. 9, wherein the first bonding pad 226 is electrically

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connected to the second bonding pad 246 via the conductive body 259. Afterwards, the mask layer 254 is removed. Accordingly, Applicant submits that independent claim 1 is allowable over the AAPA (Applicant's admitted prior art). Accordingly, it is most respectfully requested that this rejection be withdrawn.

Claims 2-7, 11, 12, 14, 23 and 24 depend from claim 1 as such are also considered to be allowable in view of the demonstrated allowability of claim 1. Accordingly, the rejection of this claims is traversed for the above reasons that claim 1 is allowable.

Although while not conceding the appropriateness of the Examiner's rejections, applicants add new claim 30, which is rewritten from the original claim 1 with more description of the first conductive body. Accordingly, claim 30 is also considered to be allowable.

Allowable Subject Matter

It is gratefully acknowledged that the Examiner considers the subject matter of claims 8-10, 13, 15-22, 25-28 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the base claim and any intervening claims. Although while not conceding the appropriateness of the Examiner's rejections, applicant adds new claim 29, which is rewritten from the original claims 1 and 9. Accordingly, claim 29 is now in condition for allowance.

Conclusion

In view of the above remarks, it is believed that the claims clearly distinguish over the patent relied on by the Examiner either alone, or in combination. In view of this, reconsideration of the rejections and allowance of all the claims are respectfully requested.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the


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telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

In view of the above comments and further amendments to the claims, favorable reconsideration and allowance of all of the claims now present in the application are most respectfully requested.

Respectfully submitted,

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